

Use of Multiple Well Environmental Assessments (EA) and Environmental Impact Statements (EIS) for Oil, Gas, and Geothermal Development

The following policy and procedure primarily applies to oil and gas development, but may also be applied in part to geothermal operations with multiple wells.

Rather than completing repetitive EAs for each Application for Permit to Drill (APD), substantial time savings and improved impact analysis can be obtained through a single NEPA analysis that addresses a Plan of Development (POD) or multiple-wells. This technique allows a single document to meet the NEPA requirements for multiple actions.

Some developmental EAs/EISs incorporate a highly effective method of projecting potential well and road locations on a map based on State spacing requirements, topography, subsurface geology, and lease stipulation constraints as part of the proposed action. With this technique, a map of the development area is produced where projected/possible well locations and access roads are clearly identified. Often, the final locations are drilled close to the projected locations. This technique allows for a more site-specific analysis of impacts in the EA/EIS. All Field Offices should consider this method of location projection when analyzing the impacts of oil, gas and geothermal development.

Proposed actions subsequent to the initial action for which the NEPA analysis is prepared may be considered for approval through the use of appropriate statutory CXs (see Attachment 2), or are reviewed using the Documentation of NEPA Adequacy (DNA) form, when statutory CXs do not apply, to ensure the proposed activity has been appropriately analyzed (see Attachment 4).

Effective immediately, all BLM Offices will address multiple proposed activities (e.g. multiple wells within a field) through a single NEPA action, whenever practical.

There are several ways to apply this policy so that it will not delay the operators who choose not to submit APDs or related rights-of-way in a logical grouping such as a POD. One option is to complete an analysis as an “umbrella” EA/EIS that analyzes “x” number of wells that will potentially be submitted over the next few years within an oil or gas field. The EA/EIS could set a time and number limit for future APDs.

Another option is to select a discrete geographic area and conduct the analysis specific to that area, estimating an anticipated (but not yet submitted) number of APDs. In these cases, additional NEPA documentation for current or future APDs and related rights-of-way within the scope of the EA/EIS analysis should rarely be necessary.

These multiple-well or POD EAs/EISs facilitate improved analysis of cumulative impacts. It is also easier to compare the impact reduction from best management practices when applied over a larger area for multiple wells. The NEPA analysis should examine at least one alternative that incorporates the applicable BMPs as described in WO-IM-2004-194, Integration of Best Management Practices into APD Approvals and Associated Rights-of-Way.